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United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMAR JONES et al,

Defendants.

CASE NO. 1:24-CR-00209-KES-BAM

STIPULATION TO CONTINUE STATUS
CONFERENCE; AND ORDER

IT IS HEREBY STIPULATED by and between Phillip A. Talbert, United States Attorney and Robert L. Veneman-Hughes, Assistant U.S. Attorney, as well as Eric Kersten, attorney for defendant JAMAR JONES, and Anthony Capozzi, attorney for defendant STEPHANIE FERREIRA, that the status conference set for September 11, 2024 at 1:00 pm before the Honorable Barbara A. McAuliffe be continued to November 13, 2024 at 1:00 p.m.

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. The parties need additional time to further investigate/explore matters related to resolving the case or setting a trial date.

2. By this stipulation, defendants now move to continue the status conference, and to exclude time from September 11, 2024 to November 13, 2024.

3. The parties agree and stipulate, and request that the Court find the following:

1 a) The government has represented that the initial discovery associated with this
2 case includes investigative reports, and related documents, photographs, etc., in electronic form.
3 All of this discovery has been either produced directly to counsel and/or made available for
4 inspection and copying. Defense would like additional time to review discovery, and investigate
5 the foundation for a resolution by plea or trial further.

6 b) The government does not object to the continuance.

7 c) An ends-of-justice delay is particularly apt in this case because:

- 8 • Defendant needs additional time to review discovery, and conduct additional
9 investigation; and
- 10 • The parties need additional time to investigate/explore matters related to
11 proceeding via plea or trial.

12 d) Based on the above-stated findings, the ends of justice served by continuing the
13 case as requested outweigh the interest of the public and the defendant in a trial within the
14 original date prescribed by the Speedy Trial Act.

15 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
16 et seq., within which trial must commence, the time period of September 6, 2024 to November
17 13, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) and
18 (h)(7)(B)(iv) because it results from a continuance granted by the Court at defendants' request on
19 the basis of the Court's finding that the ends of justice served by taking such action outweigh the
20 best interest of the public and the defendants in a speedy trial.

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25 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
26 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
27 must commence.
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1 Dated: September 6, 2024

Respectfully submitted,

2 PHILLIP A. TALBERT
3 United States Attorney

4 By /s/ Robert L. Veneman-Hughes
5 ROBERT L. VENEMAN-HUGHES
6 Assistant United States Attorney

7 Dated: September 6, 2024

/s/ Eric Kersten
8 ERIC KERSTEN
9 Attorney for Defendant Jamar JONES

10 Dated: September 6, 2024

/s/ Anthony Capozzi
11 ANTHONY CAPOZZI
12 Attorney for Defendant Stephanie FERREIRA

13 **ORDER**

14 IT IS SO ORDERED that the status conference is continued from September 11, 2024, to **November**
15 **13, 2024, at 1:00 p.m. in Courtroom 8 before Magistrate Judge Barbara A. McAuliffe.** Time is excluded
16 pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

17 IT IS SO ORDERED.

18 Dated: September 6, 2024

/s/ Barbara A. McAuliffe
19 UNITED STATES MAGISTRATE JUDGE
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